

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WISCONSIN**

NATIONAL WILDLIFE REFUGE ASSOCIATION, et al.,
Plaintiffs,

v.

RURAL UTILITIES SERVICE, et al.,
Federal Defendants,

AMERICAN TRANSMISSION COMPANY, LLC, et al.,
Intervenor-Defendants.

No. 3:21-cv-00096-wmc

Consolidated with No. 3:21-cv-
000306-wmc

NATIONAL WILDLIFE REFUGE ASSOCIATION, et al.,
Plaintiffs,

v.

UNITED STATES ARMY CORPS OF ENGINEERS, et al.,
Federal Defendants,

AMERICAN TRANSMISSION COMPANY, LLC, et al.,
Intervenor-Defendants.

**CO-OWNERS' OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO FILE
REPLY IN SUPPORT OF THEIR MOTION FOR INJUNCTION PENDING APPEAL AND
PARTIAL JOINDER OF FEDERAL DEFENDANTS' RESPONSE**

Intervenor-Defendants, American Transmission Company LLC and ATC Management Inc., ITC Midwest LLC, and Dairyland Power Cooperative ("Co-owners"), oppose Plaintiffs' Motion for Leave to File Reply in Support of their Motion for Injunction Pending Appeal, ECF No. 242. Plaintiffs have not justified a departure from this District's *Procedure To Be Followed on Motions for Injunctive Relief*, which specifically states that "There shall be no reply by the movant." (§ III.C). Accordingly, Plaintiffs' motion should be denied. In addition, the Co-owners join Federal Defendants' Response to Plaintiffs' motion, ECF No. 243, p. 2, to the extent that Federal Defendants assert that Plaintiffs'

“proposed reply, if accepted, should be given little weight,” for the reasons provided in that Federal Defendants’ response.

DATED: June 22, 2022

Respectfully submitted,

s/ David R. Zoppo

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American Transmission Company LLC by its
corporate manager, ATC Management Inc.,
ITC Midwest LLC and Dairyland Power
Cooperative.*

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2022, I electronically filed the foregoing document with the Clerk of Court using the Court's ECF system, which will serve the document on all counsel of record registered for electronic filing in the above-captioned proceeding.

Dated: June 22, 2022

/s/ David R. Zoppo
David R. Zoppo